

REMARKS

The Office Action dated June 20, 2005, has been carefully reviewed and the following remarks are submitted in response thereto. Claims 1-15 are pending in the application.

The final Office Action repeats the rejection of claims 1-3, 8, 10, and 11 under 35 USC 103(a) as being unpatentable over Zhang et al in view of RAD Data Communications. It also provides certain responses to applicant's arguments of the previous amendment filed March 24, 2005.

A main difference between the invention of claim 1 and the prior method of setting up a network with multiple service selection gateways is that the technician/administrator had to reconfigure each of the many gateways with the new numerical address of the resource to be used while with the invention the technician only has to reconfigure the numerical address given in the address server once the gateways are configured with a logical name. The gateway in the present invention is modified to look-up an address of a resource rather than being directly configured to contain the address. Zhang and RAD fail to teach such a system either alone or in combination.

Paragraph 3 of the Office Action discusses whether there is motivation to combine Zhang and RAD. Applicant had pointed out that the DNS system of RAD uses logical names for use by a human which are converted to a numerical address by a DNS server so that the human does not have to remember the numerical address. Applicant further pointed out that in the system of claim 1, neither the logical name nor the numerical address for a particular service option resource is known to the user and that there would not be motivation to combine the references. In response, the Office Action suggests that in the context of manually configuring IP addresses an "administrator of the service selection gateway *does* need to know one or the other". One skilled in the art will appreciate that in configuring addresses for the service option resources, an administrator would have to always know both the numerical address and logical name. Without advance and complete knowledge of both, the

administrator could not set up the necessary configurations to cause the gateways to convert one representation into the other. Thus, in implementing the present invention, not only does the administrator still need to always know the numerical address, they must now know the additional information of the logical name. The rejection proposes an added convenience of the administrator that motivates the combination. However, no such added convenience exists and the proposed motivation fails.

As was recently reiterated by the CAFC in Princeton Biochemicals, Inc. v. Beckman Coulter, Inc., Fed. Cir., No. 04-1493, 6/9/2005, the “‘as a whole’ instruction in title 35 prevents evaluation of the invention part by part.” Section 103 requires some suggestion or motivation in the content of the public prior art to make the new combination. Because no such motivation or suggestion is present in the prior art being applied in the present rejection, claims 1-3, 8, 10, and 11 are allowable over the cited references.

The rejection of claims 4-6 and 12-14 under 35 USC 103(a) as being unpatentable over Zhang et al in view of RAD Data Communications and further in view of Li et al is respectfully traversed. Li fails to correct for the deficiencies of Zhang and RAD noted above. Therefore, claims 4-6 and 12-14 are likewise allowable.

The rejection of claims 7 and 15 under 35 USC 103(a) as being unpatentable over Zhang et al in view of RAD Data Communications and further in view of Brown et al is respectfully traversed. Brown fails to correct for the deficiencies of Zhang and RAD noted above. Therefore, claims 7 and 15 are likewise allowable.

The rejection of claim 9 under 35 USC 103(a) as being unpatentable over Zhang et al in view of RAD Data Communications and further in view of Bero is respectfully traversed. Bero fails to correct for the deficiencies of Zhang and RAD noted above. Therefore, claim 9 is likewise allowable.

In view of the foregoing amendment and remarks, claims 1-15 are now in condition for allowance. Favorable action is respectfully solicited.

Respectfully submitted,

A handwritten signature in black ink, reading "Mark L. Mollon". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent. It is written on a white background.

Mark L. Mollon
Attorney for Applicant(s)
Reg. No. 31,123

Dated: July 25, 2005
MacMillan, Sobanski & Todd, LLC
One Maritime Plaza, Fourth Floor
720 Water Street
Toledo, Ohio 43604
(734) 542-0900
(734) 542-9569 (fax)